



279354

Exhibit B

DECLARATION OF BRYAN LANDRY

I, Bryan Landry, state the following:

1. I am a former employee of Walerko Tool & Engineering Corporation ("Walerko"). During the period of approximately October 1979 to June 1980, I performed janitorial duties for Walerko. From approximately June 1980 to Fall of 1988, I was employed at Walerko as a machinist and, during that time, I completed a four-year apprenticeship as a precision machinist. Again, from Fall of 1990 to August 1991, I was employed by Walerko as a machinist.

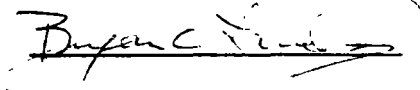
2. As a janitor, I was responsible for removing used trichloroethane ("TCA") from large steel tanks which were used by the machinists for cleaning parts during and after the parts had been milled. I did this by removing a plug on the bottom of each of the tanks, draining the used TCA into 5 gallon buckets, one bucket at a time, until the tanks were empty. Under the direction of Bob Schaefer, my supervisor, I dumped each of the buckets holding used TCA onto the ground outside of, and adjacent to, the back of the Walerko plant. I disposed of approximately 30 gallons of used TCA every two weeks. After emptying the used TCA from the tanks, I refilled the tanks with fresh TCA.

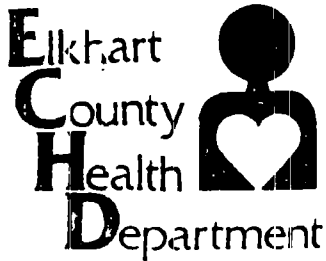
3. In 1980, as a machinist, I regularly cleaned oily parts in the TCA-filled tanks by submerging the entire part into the tank. The TCA removed the oil and metal shavings from the milled parts.

4. To the best of my knowledge, Walerko discontinued its use of TCA sometime after 1980, when it replaced the method of cleaning parts with a different solvent.

5. In late Summer 1987, a co-worker posted sample results of Walerko's drinking water, which indicated that the water was contaminated. Shortly after that, in September 1987, I volunteered information pertaining to my disposal activities at Walerko to the Elkhart County Health Department. I also provided a written statement documenting this information. An accurate copy of that statement is attached as Exhibit 1.

I declare under penalty of perjury that the foregoing is true and correct. Executed on Aug. 27<sup>th</sup>, 1992.

  
Bryan Landry



2400 ELKHART ROAD  
GOSHEN, INDIANA 46526  
PHONE: (219) 534-1404

STAN REEDY, M.D., M.P.H.  
HEALTH OFFICER

VOLUNTARY STATEMENT

DATE 9-15-87 TIME 10:30 PLACE WHERE TAKEN E.C.H.D.

IN REFERENCE TO WATERED TOOL SENS WATER  
BRYAN LANDRY

I, Bryan Landry, am 25 years of age and my address is:

19723 DETROIT ST SOUTH BEND IN 46611

I have been advised that \_\_\_\_\_ is employed in the position of \_\_\_\_\_ with the Elkhart County Health Department and have witnessed his/her identification credentials. I now make the following statement freely:

I DUMPED APPROX 55 GAL OF TRICHLOROETHANE  
A MONTH FOR ABOUT 1 year FROM 1979 - 1981  
IN THE BACK LOT OF 1935 W. LUSHER  
UNTIL I WAS TAKE OFF CLEAN UP AND  
PUT ON A MACH. BY ORDER OF MANAGEMENT.  
OTHER CHEMICALS METHYL ETHER KEYTONE ISODROPAL  
ANYHYDROS. CIARAL 100 & 160 AND OTHERS. I DONT  
KNOW TECHNICAL NAMES. ASHLAND CHEMICAL CO.  
APPROCHED TOM WATERED FOR SIX MONTHS BEFORE  
TOM DESIDED TO TAKE THERE ADVISE TO HAUL  
THE CHEMICALS AWAY.

I have read page 1 of 2 and claim the facts contained therein are true and correct

Signed Bryan Landry Date 9-15-87 PHONE NO. 291-5901

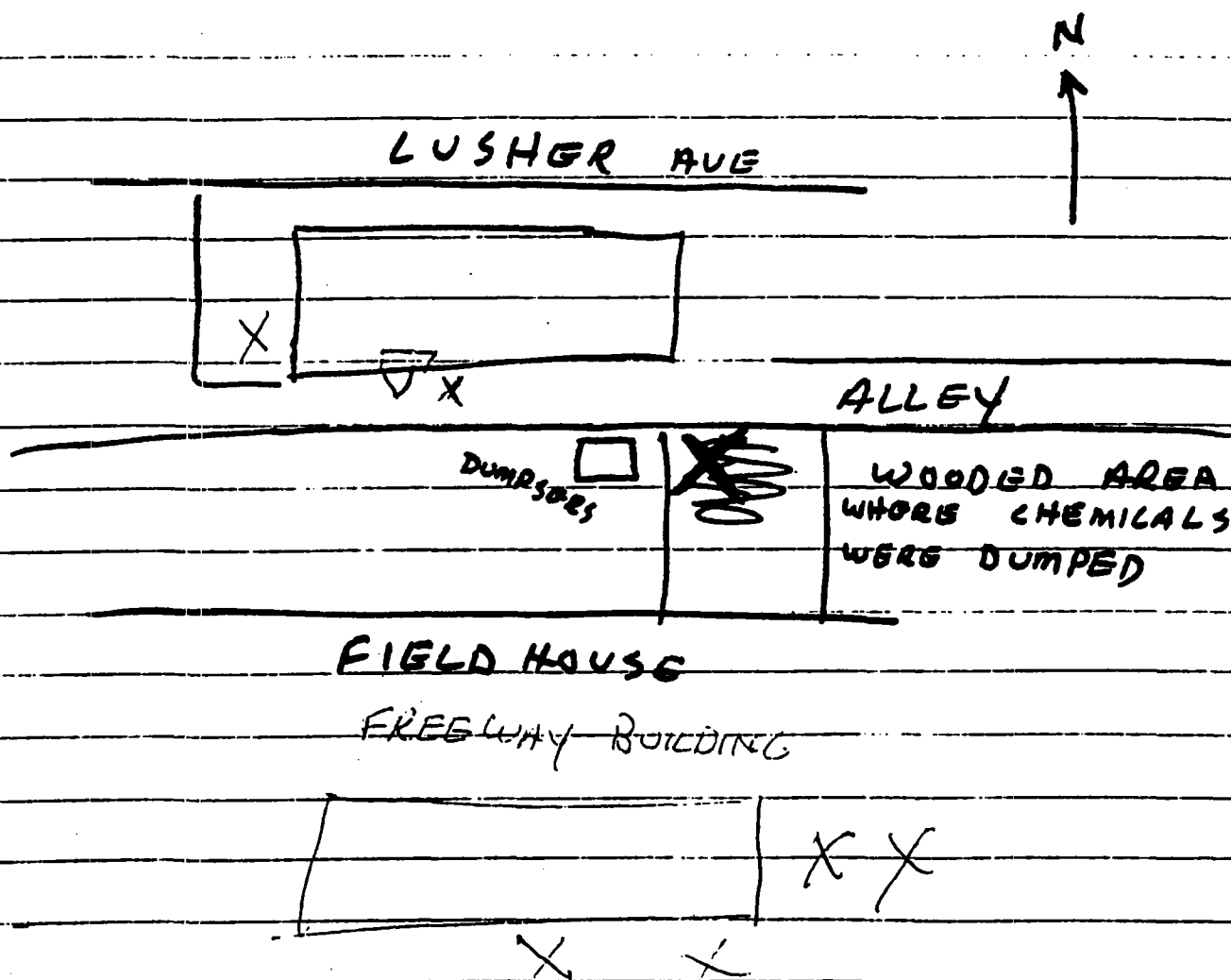
Witnessed M. V. Hill Date 9-15-87

Exhibit 1

CONTINUATION OF VOLUNTARY STATEMENT

DATE 9-15-87 PAGE 2 OF 2.

THE MOP WATER HAS BEEN DUMPED  
OUTSIDE IN THE GROUND UNTIL DRYING AROUND  
THE MOP HAS MOVED UP MANY SOLVENTS (FLAMMABLE  
OILS & CLEANING SOLVENTS) MENTIONED ON PREVIOUS  
PAGE.



I have read page 2 of 2 and claim the facts contained therein are true and correct.

Signed Bryan R. Rucker Date 9-15-87 Witnessed M. T. Miller Date 9-15-87